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September 6, 2007

## **EX PARTE**

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Wireless E911 Location Accuracy Requirements (PS Docket No. 07-114); Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems (CC Docket No. 94-102); Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling and 911 Requirements for IP-Enabled Service Providers (WC Docket No. 05-196).

## Dear Ms. Dortch:

Yesterday, I spoke on the telephone with Renee Crittendon, Legal Adviser to Commissioner Adelstein, regarding the aforementioned proceeding. In that discussion, I emphasized our prior filings in this proceeding on the current technical feasibility of implementing location accuracy at the PSAP level. I also stated that if the Commission were to require carriers to comply with that new standard it should set the effective date far enough in the future to make the goal achievable. I also stated that the Commission had allowed five years for handset replacement previously and that carriers would likely need at least that much time if handset replacement was required to achieve location accuracy at the PSAP level here.

In accordance with Section 1.1206 of the Commission's rules, an electronic copy of this letter and its attachment is being submitted via the Commission's Electronic Comment Filing System.

Sincerely,

Robert W. Zenny.